

Joseph A. Boyle  
Lauri A. Mazzuchetti  
KELLEY DRYE & WARREN LLP  
200 Kimball Drive  
Parsippany, New Jersey 07054  
(973) 503-5900

*Attorneys for Defendants  
Sprint Nextel Corporation  
Sprint Spectrum L.P. d/b/a Sprint Nextel  
and Nextel Finance Company*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JUDY LARSON, BARRY HALL, JOE  
MILLIRON, TESSIE ROBB and  
WILLIE DAVIS, individually and on  
behalf of all others similarly situated,

Plaintiff,

-against-

AT&T MOBILITY LLC f/k/a  
CINGULAR WIRELESS LLC and  
SPRINT NEXTEL CORPORATION  
and SPRINT SPECTRUM L.P. d/b/a  
SPRINT NEXTEL and NEXTEL  
FINANCE COMPANY,

Defendants.

No. 2:07-cv-05325-JLL-ES

**NOTICE OF MOTION FOR  
AN ORDER TO SHOW CAUSE TO  
STAY THE CALIFORNIA  
LITIGATIONS AND ENJOIN AND  
RESTRAIN THE BURSOR GROUP**

**(ORAL ARGUMENT  
REQUESTED)**

TO:  
Alan R. Plutzik, Esq.  
Jennifer S. Rosenberg  
Bramson, Plutzik, Mahler  
& Birkhaeuser, LLP  
2125 Oak Grove Rd., Suite, 120  
Walnut Creek, CA 94598

Scott A. Bursor, Esq.  
Bursor & Fisher, P.A.  
369 Lexington Avenue, 10th Floor  
New York, NY 10017-6535

J. David Franklin, Esq.  
Franklin & Franklin, APLC  
550 West C Street  
Suite 950  
San Diego, CA 92101

Adam Gonnelli, Esq.  
Faruqi & Faruqi, LLP  
369 Lexington Avenue 10th Floor  
New York, NY 10017

Anthony A. Ferrigno, Esq.  
Law Offices of Anthony A. Ferrigno  
1116 Ingleside Avenue  
Athens, TN 37303

Marc. G. Reich  
Reich Radcliffe LLP  
4675 MacArthur Court  
Suite 550  
Newport Beach, California 92660

L. Timothy Fisher, Esq.  
Bursor & Fisher, P.A.  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596

David Pastor, Esq.  
Gilman and Pastor, LLP  
63 Atlantic Avenue, 3rd Floor  
Boston, MA 02110

Joshua Davis, Esq.  
Law Offices of Joshua Davis  
437 Valley Street  
San Francisco, CA 94131

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned attorneys for defendants Sprint Nextel Corporation, Sprint Spectrum L.P. d/b/a Sprint Nextel and Nextel Finance Company (collectively, “Defendants”), will move before the Hon. Jose L. Linares, U.S.D.J. at Room 5D, United States District Court for the District of New Jersey, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an order directing Scott A. Bursor of Bursor & Fisher, P.A.; Alan R. Plutzik and Jennifer S. Rosenberg of Bramson, Plutzik, Mahler & Birkhaeuser, LLP; J. David Franklin of Franklin & Franklin; Adam Gonnelli of Faruqi & Faruqi, LLP; David Pastor of Gilman and Pastor, LLP; Anthony A. Ferrigno of Law Offices of

Anthony A Ferrigno; Joshua Davis of the Law Offices of Joshua Davis; and Marc G. Reich of Reich Radcliffe LLP for the *Robertson* Class; and Scott A. Bursor and L. Timothy Fisher of Bursor & Fisher, P.A.; Alan R. Plutzik of Bramson, Plutzik, Mahler & Birkhaeuser, LLP; and J. David Franklin of Franklin & Franklin for the California Subscriber Class and the California Appeal (collectively referred to as the “Bursor Group”), and all other persons acting in concert with them, to show cause why this Court should not stay any further prosecution of *In re Cellphone Termination Fee Cases*, JCCP 4332 (the “California Subscriber Class Case”) currently pending in the Alameda County Superior Court, State of California and on appeal before the Court of Appeals of the State of California First Appellate District, Division Five, No. A128026 (the “California Appeal”) and *Robertson v. Nextel Commc’ns, Inc.*, Case No. RG03114214, Calif. Super. Ct., Alameda County (“*Robertson*”) (collectively referred to as the “California Litigations”) and enjoin and restrain the Bursor Group from prosecuting any further proceedings that could result in any ruling or judgment that would conflict with this Court’s Final Judgment or otherwise interfere with this Settlement and this Court’s continuing jurisdiction over the Settlement Class;

PLEASE TAKE FURTHER NOTICE, that the Bursor Group shall immediately inform the California State courts of the entry of this Order and

immediately withdraw its applications in the California Litigations until this Court renders a final decision on Defendants' Motion for an Order to Show Cause;

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Defendants rely upon the attached Memorandum of Law in Support of Defendants' Motion for an Order to Show Cause to Stay the California Litigations and Enjoin and Restrain the Bursor Group, and the supporting Declarations of Lauri A. Mazzuchetti and A. Brooks Gresham dated July 16, 2012.

PLEASE TAKE FURTHER NOTICE that a proposed Order To Show Cause and a proposed Order are also submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested in the event that this Motion is opposed.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: July 16, 2012

KELLEY DRYE & WARREN LLP

By: s/ Joseph A. Boyle  
Joseph A. Boyle  
Lauri A. Mazzuchetti  
Vincent P. Rao II  
200 Kimball Drive  
Parsippany, NJ 07054

*Attorneys for Defendants  
Sprint Nextel Corporation  
Sprint Spectrum L.P. d/b/a Sprint Nextel  
and Nextel Finance Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2012, I caused to be served a copy of defendants Sprint Nextel Corporation, Sprint Spectrum L.P. d/b/a Sprint Nextel and Nextel Finance Company's Motion for an Order to Show Cause, together with supporting papers on all counsel of record via ECF and on the following counsel via overnight mail:

Alan R. Plutzik, Esq.  
Jennifer S. Rosenberg  
Bramson, Plutzik, Mahler  
& Birkhaeuser, LLP  
2125 Oak Grove Rd., Suite, 120  
Walnut Creek, CA 94598

J. David Franklin, Esq.  
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1116 Ingleside Avenue  
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Marc. G. Reich  
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4675 MacArthur Court  
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1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596

David Pastor, Esq.  
Gilman and Pastor, LLP  
63 Atlantic Avenue, 3rd Floor  
Boston, MA 02110

Joshua Davis, Esq.  
Law Offices of Joshua Davis  
437 Valley Street  
San Francisco, CA 94131

Dated: July 16, 2012

s/Vincent P. Rao II

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